



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

970073
EC-2

May 5, 1997

Reply To
Attn Of: ECO-088

Ref:95-103-AFS

Norm Matson
Ketchikan Administrative Area
Tongass National Forest
Federal Building
Ketchikan, Alaska 99901

Dear Mr. Matson:

We have reviewed the Draft Environmental Impact Statement (draft EIS) for the proposed **Chasina Timber Sale** in accordance with our responsibilities under the National Environmental Policy Act and §309 of the Clean Air Act. The draft EIS analyzes five action alternatives to harvest between 33 and 124 million board feet of timber on Prince of Wales Island in southeast Alaska. The draft EIS identifies Alternative 3 as the preferred action alternative.

Based on our review, we have rated the draft EIS EC-2 (Environmental Concerns - Insufficient Information). This rating and a summary of our comments will be published in the *Federal Register*.

Our primary concerns, which are related to the purpose and need for the project, potential impacts to water quality and the marine environment, and the commitment to implement necessary and appropriate mitigation measures, are highlighted below.

- 1) We are concerned that the purpose and need for the project is based on the requirements to fulfill the now-canceled Ketchikan Pulp Company long-term timber contract. This raises questions in our minds related to the fundamental need for the project.
- 2) We are concerned that some of the road closure methodologies proposed in the draft EIS are inconsistent with Alaska state regulations and would result in potentially significant impacts to fish habitat and water quality. Also, because the Forest Service is proposing to keep some of the roads constructed for this project open at the completion of harvest activities, we recommend that you contact the Army Corps of Engineers to determine if permits pursuant to Section 404 of the Clean Water Act would be required for such roads.
- 3) We are concerned that implementation of any of the action alternatives would result in the disturbance of greater than 35 percent of the acres of five watersheds (E94A, H27A, H38A, H54A, H63A) within a 15 year period. This appears to conflict with Standard and

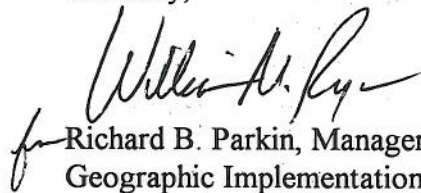
Guideline S&W112 of the 1991 proposed revised Tongass Land Management Plan which is intended to minimize the cumulative watershed effects of management practices on the Forest. We also believe more information is needed to relate the results of the three watershed analyses that were conducted to all the other watersheds within the project area for which such analyses were not conducted.

- 4) We recommend that the Forest Service consider the use of helicopter logging and helicopter transfer to barge or water for the areas that would be served by the proposed log transfer facilities (LTFs) at the West Arm Cholmondeley and North Arm Moira locations. Given the relatively small volumes proposed to be harvested from these areas, along with the relatively isolated nature of these areas, we believe that this would be a less environmentally damaging and more cost effective approach to take. We also recommend that the EIS be revised to include additional information about conditions and resources in the vicinity of the existing and proposed LTFs, as well as a demonstration of how each site complies with the siting guidelines developed by the Alaska Timber Task Force.
- 5) We recommend that the final EIS provide a clear and firm commitment to expand upon and implement the mitigation measures identified in Section 3 of the EIS. As presently written, the EIS does not provide a clear indication of the specific mitigation measures that would be implemented if the proposed project moves forward.

Enclosed please find our detailed comments, which elaborate further on these issues as well as other areas of concern we believe need to be addressed in the final EIS. We have also enclosed a summary of the rating system used in our review. We are interested in working closely with the Forest Service in the resolution of these issues and I encourage you to contact Bill Ryan at (206) 553-8561 at your earliest convenience to discuss our comments and how they might best be addressed.

Thank you for the opportunity to review this draft EIS.

Sincerely,


for Richard B. Parkin, Manager
Geographic Implementation Unit

Enclosure

cc: Kevin Hanley, ADEC
Ralph Thompson, ACOE-Juneau

Chasina Timber Sale

Detailed Comments on the Draft Environmental Impact Statement (draft EIS)

Purpose and Need

We are concerned with the discussion presented in Chapter 1 of the draft EIS in that the major "justification" for the proposed sale is to meet timber demand which appears to be driven by the requirements of the Ketchikan Pulp Company's (KPC) long-term contract. Now that the KPC contract has been terminated, and given the numerous references to the KPC contract (including an analysis in Appendix A) as the apparent impetus for the proposed sale, we have some fundamental questions and concerns about why this project is being proposed. If the underlying purpose and need for the project is to provide timber for harvest, consistent with the Tongass Land Management Plan (TLMP), we believe that the EIS (and the proposed project) should be revised to reflect the current timber "demand" on the Tongass.

We believe there are significant issues related to National Environmental Policy Act (NEPA) implementation that arise by explicitly identifying a harvest volume in the purpose and need section of the draft EIS. In stating that the proposed project would harvest approximately 40 million board feet (MMBF) or 50 MMBF (both figures are presented in Chapter 1), we believe that the specification of a target harvest volume prejudices the decision making process in that any alternative that deviates significantly from the stated volume could likely be dismissed as "not meeting the stated purpose and need." We believe that the draft EIS presents a reasonable range of alternatives for the project with estimated harvest volumes ranging between 33 and 124 MMBF for the five proposed action alternatives. Unfortunately, we are concerned that most of those alternatives are not likely to receive serious consideration, as they would not meet the harvest volume specified in the purpose and need. Furthermore, in defining a specific volume for this project, we have concerns that critical decisions in the planning process (i.e., determination of the target volume) may have been made without adequate public involvement.

Additionally, we have some concerns that the specification of a target harvest volume in the purpose and need section of the draft EIS may conflict with the Forest Service's stated direction of using "ecosystem management" in their decision-making process. It appears that the approach being taken in this EIS is to manage the ecosystem "around" the desired timber harvest level instead of identifying the elements needed to maintain a healthy ecosystem and evaluating the project alternatives in relation to those needs. We believe that a management approach which is driven by pre-defined harvest levels will not ensure maintenance of a truly healthy ecosystem within (and outside) the project area.

The draft EIS provides very little information related to the process used in defining the target timber harvest volume, and why it is judged to be "needed." At a minimum, the final EIS should clearly discuss the process used in determining the target harvest volume identified in the draft EIS, and how that process relates to the concerns identified above.

Log Transfer Facilities

It appears that each proposed action alternative would utilize the existing Lancaster Cove log transfer facility (LTF) and one or two new LTFs. Unfortunately, there is no discussion of the current conditions of the marine and terrestrial environments at the existing and proposed sites nor any evaluation of potential impacts to it. The final EIS should include any site-specific dive or other reports prepared in the development of this project. The EIS should also indicate how each of the LTFs proposed to be used satisfy (or do not satisfy) each of the Alaska Timber Task Force LTF guidelines presented in Appendix E.

We were unable to determine the methodology used to derive the potential impacts (defined in acres) from the operation of the new and existing LTFs or why the impacts from the two proposed LTFs (proposed as A-frame and low angle ramp designs) would be expected to be the same as that of the existing Lancaster Cove LTF (presently operated as a barge loading facility). Given the distinctly different designs and operations of the three facilities, we believe additional discussion is needed to clarify potential impacts from each LTF. We believe that bark deposition from raft storage of logs could potentially be significant. We recommend that the final EIS provide additional discussion/analysis of impacts from the proposed LTFs and raft storage.

We recommend that the Forest Service seriously consider the use of alternatives to log transfer which would minimize or avoid direct, indirect and cumulative effects associated with LTF operation. Given the relatively small timber volumes and the isolated nature of the areas that would be served by both proposed new LTFs (West Arm Cholmondeley, North Arm Moira), we believe that helicopter logging and transfer in the Port Johnson and West Arm areas should be integrated into the design of the project. Such an approach would be less environmentally damaging and likely to be more cost effective than the development of roads and traditional LTF facilities.

Mitigation Measures

We recommend that the mitigation measures discussed at the end of each section of Chapter 3 of the EIS be revised to clearly indicate that they would be used with the implementation of the project. As presently written, the draft EIS often presents general descriptions of activities or approaches that would, could or should be used to mitigate impacts from the proposed timber sale. For example, the measures presented on page 3-39 for mitigating impacts to aquatic resources identify measures that should be implemented to minimize impacts from the roadway system. The mitigation measures presented throughout Chapter 3 of the EIS should be revised to contain the word **would** or **shall**, indicating a clear commitment to implement them with project implementation.

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO - - Lack of Objections

The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC - - Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO - - Environmental Objections

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU - - Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 - - Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 - - Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 - - Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

Summary Paragraph Form

ERP Number D -AFS-L65285-AK

RATING EC-2

Name of EPA Official Responsible For Review Of Project (Principal Reviewer)

Bill Ryan

Summary

expressed environmental
EPA's ~~primary~~ concerns ~~are~~ related to the purpose and need for the project, potential impacts of water quality and the marine environment, and the commitment to implement necessary and appropriate mitigation measures.

Approved For Publication

(Initials of OFA
Approving Official)

Note: Transmit 2 copies to MIU